

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

IN RE:

The Roman Catholic Diocese of Syracuse, NY.

Case No. 20-30663  
Chapter 11

Debtor.

**UNITED STATES TRUSTEE’S SUPPLEMENTAL STATEMENT TO OMNIBUS  
LIMITED OBJECTION REGARDING VOLUNTARY REDUCTIONS IN FEES  
TO THE INTERIM APPLICATIONS FOR COMPENSATION  
AND REIMBURSEMENT OF EXPENSES**

TO: THE HONORABLE WENDY A. KINSELLA, UNITED STATES CHIEF BANKRUPTCY  
JUDGE:

William K. Harrington, the United States Trustee for Region 2 (the “United States Trustee”), through counsel, respectfully files this supplemental statement of omnibus limited objection regarding voluntary reductions in fees to the interim fee applications (the “Applications”) of the retained professionals (collectively, the “Retained Professionals”) of the Diocese of Syracuse, N.Y. (the “Debtor”) seeking interim compensation and reimbursement of out-of-pocket expenses for the time periods set forth below and defined as to each of the Retained Professionals, as follows:

ECF Docket No.	Applicant	Fees Requested	Expenses Requested	Total	Application Period	Voluntary Reduction in Fees
2131	Bond, Schoeneck & King, PLLC, <i>Counsel for the Diocese</i>	\$578,293.00	\$4,369.83	\$582,662.83	08/01/23- 02/29/24	\$10,000
2132	Blank Rome, LLP, <i>Special Counsel for the Diocese</i>	\$71,056.59	\$778.20	\$71,834.79	08/01/23- 02/29/24	\$1,300
2133	MacKenzie Hughes, LLP <i>Special Counsel for Diocese</i>	\$105,622.00	\$9.80	\$105,631.80	08/01/23- 02/29/24	\$2,500
2134	Stinson LLP, <i>Counsel to Official Committee of Unsecured Creditors</i>	\$778,545.00	\$3,706.26	\$782,251.26	08/01/23- 02/29/24	Unresolved.

ECF Docket No.	Applicant	Fees Requested	Expenses Requested	Total	Application Period	Voluntary Reduction in Fees
2136	Burns Bair LLP, <i>Counsel to Official Committee of Unsecured Creditors</i>	\$154,060.00	\$1,294.44	\$155,354.44	08/01/23-02/29/24	\$1,300
2140	Saunders Kahler, L.P.P., <i>Local Counsel to the Official Committee of Unsecured Creditors</i>	\$2,847.50	\$340.00	\$3,187.50	08/01/23-02/29/24	No Objection
2138	The Claro Group <i>Valuation Expert to the Official Committee of Unsecured Creditors</i>	\$1,139	\$0.00	\$1,139	03/01/23-07/31/23	No Objection
2137	Berkeley Research Group, LLC <i>Financial Advisor to the Official Committee of Unsecured Creditors</i>	\$5,315.62	\$0.00	\$5,315.62	08/01/23-02/29/24	No Objection
2135	The Official Committee of Unsecured Creditors, <i>Attendance at Mediation</i>		\$2,366.53	\$2,366.53	02/05/24-02/07/24	No Objection

1. A hearing on the Applications is scheduled for September 18, 2024, at 10:00 a.m.
2. The Retained Professionals filed the Applications on August 15, 2024, as denoted above.
3. The United States Trustee reviewed the fee applications filed by the following Retained Professionals and had no objections to their applications: Saunders Kahler, LPP [ECF Doc. No. 2140], The Claro Group [ECF Doc. No. 2138] and Berkeley Research Group, LLC [ECF Doc. No. 2137]. The United States Trustee does not object to the Committee's request for expenses in the amount of \$2,366.53. [ECF Doc. No. 2135].
4. On September 11, 2024, the United States Trustee filed an Omnibus Objection to the Applications ("UST Objection"), requesting that the Court reduce the allowance of fees to be paid to certain Retained Professionals.
5. In response to the UST Objection, the United States Trustee and certain Retained Professionals engaged in settlement discussions which respect to each of the Retained

Professionals' Applications to which the United States Trustee objected.

6. With respect to the Bond, Schoeneck & King, PLLC ("BSK") Application, the United States Trustee conferred with counsel and raised concerns as outlined in the UST Objection that BSK billed for multiple professionals without sufficient justification, administrative tasks/overhead and vague time entries, junior attorney tasks and unnecessary online research. In response, BSK has agreed to a \$10,000.00 reduction in fees in satisfaction of all United States Trustee's objections and concerns. Therefore, the United States Trustee has no objection to fees and expenses to be awarded to BSK in the amount of \$568,293.00 and \$4,369.83 respectively, for a total of \$572,662.83 for its Eighth Interim Application.

7. With respect to the Blank Rome LLC ("Blank Rome") Application, the United States Trustee identified multiple instances in which two or more professionals billed for the same task and administrative tasks that were in the nature of overhead. Blank Rome has agreed to a \$1,300.00 reduction in fees in satisfaction of all United States Trustee's objections and concerns. Therefore, the United States Trustee has no objection to fees and expenses to be awarded to Blank Rome in the amount of \$69,756.59 and \$778.20 respectively, for a total of \$70,534.79 for its Eighth Interim Application.

8. With respect to the MacKenzie Hughes, LLP ("MacKenzie H Application, the United States Trustee identified instances in which two or more professionals billed for the same task and administrative tasks that were in the nature of overhead. MacKenzie has agreed to a \$2,500 reduction in fees in satisfaction of all United States Trustee's objections and concerns. Therefore, the United States Trustee has no objection to fees and expenses to be awarded to MacKenzie Hughes in the amount of \$103,122.00 and \$9.80 respectively, for a total of

\$103,131.80 for its Eighth Interim Application.

9. With respect to the Stinson, LLP (“Stinson”) Application, the United States Trustee conferred with counsel regarding the issues raised in the UST Objection, including the high percentage of fees attributable to professionals reviewing pleadings or the work product of other professionals, vague time entries, and non-compensable clerical tasks. The United States Trustee and Stinson have not reached a resolution and request an adjournment to allow the parties to continue their discussion in an effort to resolve the UST Objection.

10. With respect to the Burns Bair LLP (“Burns Bair”) Application, the United States Trustee conferred with counsel regarding issues raised in the UST Objection. In response, Burns Bair has agreed to a \$1,300 reduction in fees in satisfaction of all United States Trustee’s objections and concerns. Therefore, the United States Trustee has no objection to fees and expenses to be awarded to Burns Bair Blank in the amount of \$152,760 and \$1,294.44 respectively, for a total of \$154,054.44 for its Sixth Interim Application.

11. Based upon the voluntary reductions and information as set forth above, the United States Trustee has determined that the services performed by the Retained Professionals were necessary and that the fees requested for such services are reasonable.

**WHEREFORE**, the United States Trustee does not object to the entry of an order of this Court approving the Retained Professionals’ fees in the reduced amount denoted above.

Dated: September 17, 2024  
Utica, New York

Respectfully submitted,

**WILLIAM K. HARRINGTON**  
**UNITED STATES TRUSTEE FOR REGION 2**

/s/ Erin P. Champion  
**ERIN P. CHAMPION**  
**ASSISTANT UNITED STATES TRUSTEE**  
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